

TDSF/EPA PARTNERSHIP PILOT SITE

HOWARD HIGH SCHOOL LANDFILL

Chattanooga, Hamilton County, Tennessee

SITE BACKGROUND

Howard High School is located at 2500 South Market Street in south Chattanooga. The 44 acre landfill, owned by the City of Chattanooga, is located between the school and Chattanooga Creek. The site includes the landfill and two areas on the school grounds requiring a response action. The two areas are the school's day care center, and a football practice field and adjacent nature trail.

The area where the landfill is now located was originally a meander channel of Chattanooga Creek. During the late 1960's Chattanooga Creek was channelized for the construction of a railroad track located south of the site. The channelized caused this area to be flooded. The City of Chattanooga subsequently filled it in 1972 with brush, demolition debris, foundry sand, and spoil dirt. The City called the landfill "the South Market (28th) Street Trash Disposal Site" and operated it until approximately 1976. An inspection report memo written during the operation of the landfill, stated that metal drums and small amounts of household garbage were also being disposed.

During the Site Inspection Prioritization (SIP), the school's day care center was discovered to contain elevated levels of Polyaromatic Hydrocarbons (PAHs) and heavy metals in the surface soil. There are approximately 55 children enrolled at the day care center.

Located adjacent to the day care center is the school's football practice field. There have been complaints from students receiving skin rashes after playing in this field. The southwestern portion of the field floods during rain storms.

The Chattanooga Field Office of the Tennessee Department of Environment and Conservation conducted a Preliminary Assessment in November 1986, a Site Investigation in September 1988, and a Site Inspection Prioritization in January 1994. These investigations resulted in the following recommendations for remedial action:

- Repair sewer line by the nature trail
- Improve storm water drainage from the football practice field
- Remedied contaminated soil from the day care center: excavate 18 inches of contaminated surface soil and replace with 6 inches compacted clay, 60 mil plastic liner, and 12 inches of soil cover
- Restrict access to the landfill by fencing the boundary and placing warning signs
- Repair the existing landfill cover and removing trees
- Install gravel trails and other improvements on the nature trail

The City of Chattanooga, as the property owner and operator, has agreed to implementing most of these recommendations. TDEC proposes that the City enter into a Voluntary Order to carry out the cleanup.



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PROBLEM STATEMENT/GOAL

The EPA can help expedite the remedial action by assisting the CFO with community relations activities and providing technical review of submittal. Specifically difficult community relations problems may arise because of Environmental Justice issues concerning the surrounding community, and because unacceptable exposure risks involve children. A proactive community relations plan may be needed.

Three goals are:

- Expedite remedial action by identifying and removing bureaucratic obstacles
- Design and maintain a proactive community relations plan, including an efficient communication strategy between all parties involved
- Complete the remedial action by September 1996

NEEDS ASSESSMENT

- CFO and EPA to draft a Community Relations Plan
- EPA will assist CFO with the mechanics of the communication strategy (i.e. mailing fact sheets and dealing with the media)
- EPA will attend meetings with the City and community and assist as needed
- EPA will provide technical peer review

INTEGRATED MILESTONES

- Signed Voluntary Order
- Approval of an R.A. Work Plan
- Community Relations Plan finalized
- Construction of the remedy completed
- Approval of the Final RA Report

SCHEDULE

1996 PROJECT SCHEDULE	
May 1	Signed Voluntary Order
July 1	Approved R.A. Work Plan
July -- August	Implement Remedy
September 1	R.A. Report submittal